

James V. Marks (JM 6257)  
HOLLAND & KNIGHT LLP  
195 Broadway  
New York, NY 10007  
(212) 513-3200

Attorneys for Plaintiff-Petitioner  
Penrod Management Group  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PENROD MANAGEMENT GROUP,

07-CV-10649

Plaintiff-Petitioner,

- against -

STEWART'S MOBILE CONCEPTS, LTD.,

**MOTION FOR ADMISSION  
PRO HAC VICE**

Defendant-Respondent.

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I, James V. Marks, am a member in good standing of the bar of this Court. My bar number is JM 6257. I am moving pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for the admission of L.H. Steven Savola to appear *pro hac vice* in this case as counsel for Plaintiff Penrod Management Group.

I certify that:

1. The proposed admittee is a member in good standing of the bar of the following State Courts and/or United States Courts:

**L.H. Steven Savola:**

**Court:** State Court of Florida

**Date of Admission:** May 23 1985

**Court:** United States District Court, Southern District of Florida

**Date of Admission: September 23 1985**

2. During the twelve months immediately preceding this motion, the proposed admittee has never been admitted *pro hac vice* in this Court.

3. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction.

4. There is no pending disciplinary proceeding against L.H. Steven Savola in any State or Federal court.

5. The proposed admittee is familiar with the Code of Professional Responsibility, the Federal Rules of Civil and Criminal Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate Procedure and the Local Rules of this Court, and understand they shall be subject to the disciplinary jurisdiction of this Court.

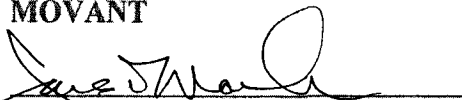
6. The proposed admittee understands admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

7. The undersigned movant is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.


8. **The \$25.00 fee for admission *pro hac vice* is enclosed.**

Respectfully submitted,

**MOVANT**

  
James V. Marks, Esq.  
Holland & Knight, LLP  
195 Broadway  
24<sup>th</sup> Floor  
New York, NY 10007  
Phone: 212-513-3531  
Fax: 212-513-9010

**PROPOSED ADMITTEE**

  
L.H. Steven Savola, Esq.  
Savola LLC Law Firm  
8770 Sunset Drive  
#443  
Miami, FL 33173  
Phone: 305-279-6406  
Fax: 305-534-7253



## The Florida Bar

JOHN F. HARKNESS, JR.  
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET  
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600  
WWW.FLORIDABAR.ORG

State of Florida )

County of Leon )

In Re: 473359  
L Steven Savola  
Savola, LLC43  
8770 Sunset Dr., #443  
Miami, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on May 23, 1985.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this 10<sup>th</sup> day of December, 2007.

A handwritten signature in black ink that reads "Willie Mae Shepherd". The signature is fluid and cursive.

Willie Mae Shepherd  
Supervisor, Membership Records  
The Florida Bar

WMS/lvm50a:R10

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**AFFIRMATION OF  
JAMES V. MARKS  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

James V. Marks, being duly sworn, hereby deposes and says as follows:

1. I am a partner of the law firm Holland & Knight LLP, counsel for Plaintiff Penrod Management Group in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit L.H. Steven Savola as counsel *pro hac vice* to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1995. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Mr. Savola since February, 2006.

4. Mr. Savola is a General Counsel of Plaintiff Penrod Management Group and partner in the Savola LLC Law Firm, in Miami, Florida.

5. I have found Mr. Savola to be a knowledgeable attorney. I understand he is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

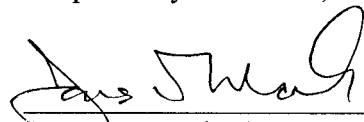
6. Accordingly, I am pleased to move the admission of L.H. Steven Savola, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of L.H. Steven Savola, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit L.H. Steven Savola, *pro hac vice*, to represent Plaintiff in the above captioned matter, be granted.

Dated: December 13, 2007  
City, State: New York, NY

Respectfully submitted,

  
James V. Marks (JM 6257)

# 4987362\_v1

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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PENROD MANAGEMENT GROUP,

Plaintiff-Petitioner,

- against -

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Defendant-Respondent.

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**ORDER FOR ADMISSION**  
**PRO HAC VICE**

Upon fulfilling the requirements set forth in 28 U.S.C. § 1746(2), L.H. Steven Savola is hereby admitted Pro Hac Vice for all purposes for this action.

IT IS SO ORDERED

Dated: \_\_\_\_\_, 2007

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U.S. District Judge John G. Koeltl